

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS
EASTERN DIVISION**

In Re:

JOHN MALONE

Debtor

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**Chapter 13
Case No. 24-10885-CJP**

DEBTORS' MOTION TO SELL PROPERTY

Now comes, John Malone, ("Debtor") by and through undersigned counsel, Glenn F. Russell, Jr., and who herein respectfully files his Motion to Sell the Property located at 26 Savin Hill Avenue, Dorchester MA. In support thereof, the Debtor states as follows:

1. There will be no Real Estate Broker involved in the transaction.
2. All creditors will be paid in full of the proceeds from the sales transaction, where there will be a 100% dividend to all allowable claimants
3. The Debtor will file an Amended Chapter 13 Plan to reflect a lump sum Plan as described above.

WHEREFORE, for all of the foregoing reasons, the Debtor, by and through his counsel, Glenn F. Russell, Jr., respectfully requests that the Court Grant the Debtor's Motion to sell the Property located at 26 Savin Hill Avenue, Dorchester Massachusetts, in order to utilize the proceeds from said sale to fund a lump sum Chapter 13 Plan to pay all allowable claimants a 100% Dividend.

Respectfully submitted,

Date: December 16, 2024

Attorney for the Debtor
/s/ Glenn F. Russell, Jr.
Glenn F. Russell, Jr.
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Fall River, MA 02720
(888) 400-9318
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CERTIFICATE OF SERVICE

I, Glenn F. Russell, Jr., do hereby certify that on the 16th day of December 2024, I served the Debtors' Motion to Sell Property located at 26 Savin Hill Avenue, Dorchester, MA, to the following parties via electronic mail and submission to the ECF System, and/or by USPS postage prepaid to the following:.

Assistant U.S. Trustee

John Fitzgerald

Office of the US Trustee
J.W. McCormack Post Office &
Courthouse
5 Post Office Sq., 10th Fl, Suite 1000
Boston, MA 02109

Trustee

Carolyn Bankowski
Ch 13-12 Trustee Boston
P. O. Box 8250
Boston, MA 02114
617-723-1313

Boston Water and Sewer Commission

P.O. Box 55466
Boston, MA 02205

City of Boston Real Estate Tax

CITY OF BOSTON, BOX 55808
Boston, MA 02205

Discover Bank

2479 Edison Blvd, Unity A
Twinsburg, OH 44087-234

Fed Home Loan Mortgage Corp as Trustee

Brian M. Kiser, Esq.
Marinosci Law Group, P.C.
275 West Natick Road
Suite 500
Warwick, RI 02886

National Grid

P.O. Box 371338
Pittsburgh, PA 15250-7338

Specialized Loan Servicing, LLC

Specialized Loan Servicing LLC
P.O. Box 636005
Littleton, CO 80163-6005

The Bank of NY Mellon Indenture Trustee

c/o Bank of America, N.A.
Marcus Pratt
Korde & Associates, P.C.
900 Chelmsford Street, Suite 3102
Lowell, MA 01851

/s/ Glenn F. Russell, Jr.

Glenn F. Russell, Jr.